

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re: Leo Neal Jr : Case No: 24-53530
Debtor(s) : Chapter 13 Judge: Mina Nami Khorrami
: 341 Meeting 10/16/2024

CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION

Now comes Edward A. Bailey, Standing Chapter 13 Trustee, and objects to the confirmation of the plan and requests that the Court enter an Order denying confirmation for the reasons set forth below and dismissing the case, pursuant to 11 U.S.C. §1307. This objection supersedes any prior objection filed in this case by the Trustee.

Above median income X Below median income

 X **11 U.S.C. §1325(a)(1)**-Plan does not comply with all provisions of Chapter 13 of Title 11 and the other applicable provisions of Title 11:

 X Trustee is unable to accurately determine length. **Plan does not provide an interest rate to the secured debt owed to St. Rita's Medical Center.**

 X Plan takes over 60 months to complete. **Plan projects to 90 months as Debtor's plan does not provide treatment for the secured debt owed to Logan County Treasurer.**

 X Other: **Schedule A/B does not disclose Debtor's interest in a probate estate.**

Debtor's Schedule A/B does not disclose \$46,378.40 that is being held by the Registry Fund from case number 22-51185.

 X **11 U.S.C. §1325(a)(9)**-Debtor(s) have failed to file all applicable federal, state, and local tax returns for 4 years prior to filing. **The Trustee requests a copy of Debtor's 2023 tax return to verify filing.**

Therefore, the Trustee prays that confirmation is denied and this case be dismissed for cause pursuant to §1307(c).

TERMS OF THE PLAN:

Plan Payments:

Best Interest Dividend: 100% Dividend: 100%

Length: 90 Months

Dated: October 22, 2024

Respectfully submitted,

/s/ Edward A. Bailey

Edward A. Bailey (0068073)

Chapter 13 Trustee

550 Polaris Parkway, Suite 500

Westerville, OH 43082

Tel: (614)-436-6700

Fax: (614)-436-0190

Email: trustee@ch13.org

CERTIFICATE OF SERVICE

The undersigned hereby certified that on the date shown below a copy of the Trustee's Objection to Confirmation was served electronically on the Office of the United States Trustee and Debtor's attorney, and on the Debtor(s) at the address as currently shown in the Trustee's records by regular first class mail, postage prepaid.

Dated: October 22, 2024

/s/ Edward A. Bailey

Edward A. Bailey (0068073)

Chapter 13 Trustee

550 Polaris Parkway, Suite 500

Westerville, OH 43082

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